

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
Lynchburg (Charlottesville) Division**

In re: CHRISTOPHER L. KENT
8568 Venable Road
Kents Store, VA 23084
xxx-xx-7299
Debtor.

Case No. 17-60279-RBC
Chapter 13

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW the Commonwealth of Virginia, Department of Social Services, Division of Child Support Enforcement (the “Division”) by counsel, and hereby objects to the confirmation of the chapter 13 plan filed on February 23, 2017 by the debtor in the above-captioned case (the “Debtor”), and in support thereof respectfully states as follows:

1. On February 14, 2017 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 13 of the Bankruptcy Code.

2. On February 23, 2017, the Debtor filed his proposed corrected chapter 13 plan (the “Plan”).

A. The Debtor is Not Current With Post-Petition Domestic Support Payments

4. The Debtor has an open case with the Division and owes a claim for domestic support obligations.

5. The domestic support claims are entitled to priority under 11 U.S.C. § 507(a)(1).

6. Specifically, the Debtor is ordered to pay the following domestic support obligations:

Case Number	Monthly Support
4795813	\$302.87

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7. Since the Petition Date, current support obligations for the months March and April 2017 have come due in the total amount of \$605.74.

8. The Debtor has not made any post-petition payments to the Division.

9. In order to have a chapter 13 plan confirmed, a debtor must be current on his/her payment of post-petition child support obligations pursuant to 11 U.S.C. § 1325(a)(8)

WHEREFORE, for the reasons stated herein, the Commonwealth of Virginia, Department of Social Services, Division of Child Support Enforcement, respectfully requests that the Court deny confirmation of the Debtor's chapter 13 plan and grant the Division such other and further relief as it deems just and proper.

Dated: April 5, 2017

COMMONWEALTH OF VIRGINIA,
DEPARTMENT OF SOCIAL SERVICES,
DIVISION OF CHILD SUPPORT ENFORCEMENT

/s/ Elizabeth L. Gunn

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Certificate of Service

I hereby certify that on the 5th day of April, 2017, I electronically filed the foregoing Objection to Confirmation of Chapter 13 Plan with the Clerk of Court using the CM/ECF system, which provides electronic notice of such filing to all parties that receive notice in this matter including the following:

Melvin A. Burruss, Esq.
Counsel for the Debtor

Herbert L. Beskin, Esq.
Chapter 13 Trustee

and mailed a copy of the foregoing by first class mail, postage prepaid, to the following non-CM/ECF participant:

Christopher L. Kent
8568 Venable Road
Kents Store, VA 23084

/s/ Elizabeth L. Gunn
Assistant Attorney General